

Appl. No. 10/027,686
Amdt. Dated 06/27/2005
Reply to Office Action of March 25, 2005

REMARKS/ARGUMENTS

This Amendment is in response to the Office Action mailed March 25, 2005. In the Office Action, claim 17 was objected and claims 1-20 were rejected under 35 U.S.C. §103(a). Applicants respectfully traverse these rejections and request reconsideration of the allowability of claims 1-20. Claims 1, 13 and 16 have been revised.

Objection of Claim 17

Claim 17 was objected due to a duplicate listing. Applicant has revised claim 16 to remove the duplicative listing and respectfully requests the Examiner to withdraw the outstanding objection.

Rejection Under 35 U.S.C. § 103

Claims 1-20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Shah (U.S. Patent No. 6,292,832) in view of Still (U.S. Patent No. 6,718,390). Applicants respectfully traverse the rejection because a *prima facie* case of obviousness has not been established.

As the Examiner is aware, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify a reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all of the claim limitations. See *MPEP §2143*; see also *In Re Fine*, 873 F. 2d 1071, 5 U.S.P.Q.2D 1596 (Fed. Cir. 1988). Herein, the combined teachings of the cited references fail to describe or suggest all the claim limitations.

For instance, as generally set forth in independent claims 1, 7 and 13, Applicants respectfully submit that neither Shah nor Still, alone or in combination, teach or suggest the translation of a plurality of *relative links*, performed by a *personal content director*, into a corresponding plurality of *absolute links* that...*point to* the local domains associated with the ... *personal content director(s)*. *Emphasis added*. Applicants agree that Shah does not teach that

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the data includes a plurality of relative links and the translating operation as claimed. *See pages 2-3 of the Office Action.* However, Applicants disagree that Still provides such teachings.

In particular, column 4, lines 58-63 of Still describes a server proxy (210) that intercepts a HTML result, namely one or more HTML pages recovered from a resource (216) in communication with server (208), and scans the HTML result to identify references (e.g., hyperlink) to resources hosted by the server (208). If any references are found, they are modified to refer to the server (206) or server proxy (210). Hence, the teachings of Still are directed to a process to centralize subsequent requests to a particular server (206 or 210), which is contrary to the claimed invention that alters the relative links into absolute links that point to particular local domains, namely a mechanism for decentralizing subsequent requests. *See page 12, lines 6-23 of the subject application.*

In fact, the combination of both Shah and Still teach away from the claimed invention in which the communications are focused to a centralized server (e.g., distributed director 506, server 206/210) and are not directed to modification of the relative links to absolute links as claimed. As defined in claim 1, the absolute link is a superset of the relative link by further including a domain name as set forth in an illustrative example on page 12 of the subject application.

In addition, based on the dependency of claims 2-6, 8-12 and 14-20 on independent claims 1, 7 and 13, which are believed by Applicants to be in condition for allowance, no further discussion as to the grounds for traverse is warranted. Applicants reserve the right to present such arguments in an Appeal is warranted. Withdrawal of the §103(a) rejection as applied to claims 2-6, 8-12 and 14-20 is respectfully requested.

Request for Examiner's Interview

The Examiner is respectfully requested to contact the undersigned by telephone at the phone number listed below if after review, such claims are still not in condition for allowance. This telephone conference would greatly facilitate the examination of the present application.

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Conclusion

In view of the remarks made above, it is respectfully submitted that pending claims 1-26 and 30-33 define the subject invention over the prior art of record. Thus, Applicant respectfully submits that all the pending claims are in condition for allowance, and such action is earnestly solicited at the earliest possible date.

Respectfully submitted,

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Dated: 06/27/2005

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Susan McFarlane

06/27/2005

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